

The proposed recording requirement would place burdens upon our stations that would have no positive effect, and would have definite negative effects. First, indecency, or even inappropriateness, is already governed by our local marketplace, and instantly. There is nothing the FCC can do affect that in any way. Our listeners know us personally, and we know them. We live with each other every day. We hear from them daily. Our advertisers, as a part of our listeners, are in the same close touch with us, too. If we do things wrong, we will be financially out of business quickly. The FCC is powerless to change that. Our local listeners regulate us effectively and quickly, something the FCC cannot, and needs not, do.

What the FCC can and does do is limit the service we can provide to our public with increasingly expensive and needless regulations. This proposal would require a significant equipment purchase, plus the engineering time to install and interconnect it all. Our budgets are small, with no "fat", our profit is tiny, and the cost could not be covered by it. Revenue growth in our market is severely limited. Employment, and thereby local service, would have to be cut to accomodate this proposed regulation.

All of this would be to address a "problem" that doesn't exist, here or really anywhere else, either. People who don't like what's on the air can turn it off. They already do. Even with the current senseless national "uproar", the percentage of indecency problems is so small as to not even show up, statistically.

Further, our freedom depends on a justice system that requires an accuser to prove charges against an accused. This proposed regulations would require us, the accused, to prove we are innocent instead. Reckless accusations would become commonplace, creating even greater expense to broadcasters, which would further decrease local service. By what absolute standards would "indecency" be defined? Since that's not possible, it would become constant exercises in interpretations, and there would not be a benefit to anybody at all, except those who make money by administering and operating within the legal system.

When the freedom of the press and the freedom of speech and expression guarantees in our US Constitution are considered, existing content regulation is unconstitutional and anti-American, and this would simply make it worse.

I ask the FCC NOT to add this proposal to the pile of regulation that already is limiting the service we local broadcasters can provide to our communities.

Robert Hampson, Jr.
President
RH Communication, Inc.
WBRN & WBRN-FM